

**Federal Defenders
OF NEW YORK, INC.**

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March 20, 2023

BY EMAIL & ECF

The Honorable Jennifer E. Willis
United States Magistrate Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Gregory Gumucio
22 Mag. 6904 (UA)**

Dear Judge Willis:

We write, as counsel for Gregory Gumucio in the above-captioned matter, to respectfully request a modification of Mr. Gumucio's bail conditions to permit him to travel to the Eastern District of Washington to attend his daughter's sports events. Pretrial Services consents to this request; the government does not object.

On August 30, 2022, Mr. Gumucio was presented in Magistrate Court. Following a contested bail hearing, Your Honor set the following bail conditions:¹

\$250,000 personal recognizance bond to be co-signed by two financially responsible persons and one individual with moral suasion (specifically, Mr. Gumucio's adult son); compliance with pretrial services supervision as directed; no airport travel (with specifics to be set by pretrial services); standalone location monitoring; no direct or indirect contact with any current or former employees of Yoga to the People identified by the government;² no travel within 60 miles of the Canada border; surrender all travel documents with travel restricted to the Western District of Washington, the District of Oregon (solely for child's sports-related travel), and the Southern District of New York.

¹ The government did not argue for detention, but instead argued for home incarceration with a \$1 million bond.

² To date, the government has not provided the defense with the non-exhaustive list of individuals that Mr. Gumucio is expected not to contact.

On October 7, 2022, at Mr. Gumucio's request, the Court modified the bond to require only two financially responsible cosigners. On January 26, 2023, at Mr. Gumucio's request, the Court modified the conditions of Mr. Gumucio's release to permit him to travel to Portland to seek employment.

For the past seven months since his arrest, Mr. Gumucio has complied with all of the conditions of his release, including wearing a location monitoring device and abiding by all travel restrictions. Mr. Gumucio now seeks permission to travel to the Eastern District of Washington for his daughter's sporting events. Pretrial services consents to this request; the government does not object.

Thank you for your attention to this matter.

Respectfully submitted,

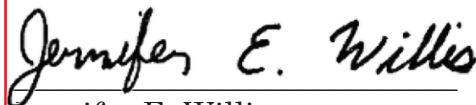
/s/

Marne L. Lenox, Esq.
Michael Arthus, Esq.

Counsel for Gregory Gumucio

cc: Counsel of record

SO ORDERED.

A handwritten signature in black ink that reads "Jennifer E. Willis". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

Jennifer E. Willis
United States Magistrate Judge

March 20, 2023